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RECEIVED

FEB - 6 2006

Federal Communications Commission:
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

**Vermont Telephone Company, Inc. 499 Filer ID 809604
Vtel Wireless, Inc. 499 Filer ID 817906**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

**Copies: 4 additional copies to Secretary
Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)**

No. of Copies rec'd 044
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Vermont Telephone Company, Inc. 499 Filer ID 809604
Vtel Wireless, Inc. 499 Filer ID 817906

354 River St., Springfield, VT 05156 (800) 279-4049 Incumbent

CERTIFICATION

I am J. Michel Guite, Chairman and Chief Executive Officer of Vermont Telephone Company, Inc. On behalf of Vermont Telephone Company, Inc. and its affiliate Vtel Wireless, Inc. (collectively "Company") I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.¹ Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



J. Michel Guite
Chairman and Chief Executive Officer
Vermont Telephone Company, Inc.
February 2, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

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STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Vermont Telephone Company, Inc. and its affiliate Vtel Wireless, Inc., (collectively "Company" or "the Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

As of this date, the Company has not used CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation, disaggregation or refinement based on CPNI.

1. Identification of CPNI

To the extent the Company uses CPNI in the future, the Company will establish procedures and train employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

2. Identification of Services Affected by CPNI Rules

To the extent the Company uses CPNI in the future, The Company will establish procedures and train employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

To the extent the Company uses CPNI in the future, the Company will establish procedures and train employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

To the extent the Company uses CPNI in the future, the Company will establish procedures and train employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.

5. Customer Notification and Authorization Process

Because the Company has not used CPNI for marketing thus far, the Company has not implemented notice and approval procedures. However, the Company is aware of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides of written notification, the Company's notification will comply with the requirements of the Section 64.2007(f)(2).

6. Training

The Company has trained existing employees and will train new employees having access to CPNI regarding privacy of customer records and will incorporate marketing-specific training regarding the FCC's CPNI rules prior to undertaking the use of CPNI for marketing purposes.

7. Record of Customer CPNI Approval/Non-Approval

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

8. Disciplinary Process

Prior to undertaking to use CPNI for marketing, the Company will have in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required in compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules.

9. Software Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.